United States District Court

EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

SEALED

v.

CRIMINAL COMPLAINT

TRENT LEE STANBERRY,

Case No. 22-MJ-91-KEW

Defendant.

I, Special Agent Adam Babiker, the undersigned complainant, state that the following is true to the best of my knowledge and belief.

On or about May 7, 2021, in the Eastern District of Oklahoma, defendant, TRENT LEE STANBERRY, committed the crime of Certain Activities Relating to Material Involving the Sexual Exploitation of Minors in violation of Title 18, United States Code, Sections 2252(a)(2) & (b)(1) and 2252(a)(4)(B) & (b)(2).

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

(See attached Affidavit of Special Agent Adam Babiker, which is attached hereto and made a part hereof by reference.)

ADAM BABIKER

FEDERAL BUREAU OF INVESTIGATION

Kuming & Shest

Sworn to before me and subscribed in my presence at: MUSKOGEE, OKLAHOMA

Date: March 30, 2022

KIMBERLY E. WEST

UNITED STATES MAGISTRATE JUDGE

Name and Title of Judicial Officer

Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

6:22-cr-00063-JFH

I, Adam Babiker, a Special Agent with the Federal Bureau of Investigation, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

- 1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed in that capacity since 2019. I am currently assigned to Ardmore Resident Agency "RA" of the Oklahoma City Filed Office. I am a federal law enforcement officer within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant and make arrests. Since joining the FBI, I have investigated violations of federal law, including federal violations concerning child pornography and the sexual exploitation of children. I have gained experience through training classes and work conducting these types of investigations. Further, as a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.
- 2. I am familiar with the circumstances of the offenses described in this affidavit through a combination of personal knowledge of the facts, discussion with other law enforcement officials and other investigative activities conducted and investigative materials obtained during the investigation.
- 3. I make this affidavit in support of an application for issuance of a criminal complaint and arrest warrant for **TRENT STANBERRY**, for violations of Title 18 §§ 2252(a)(2) and 2252(a)(4)(B). This affidavit does not include all facts known to me, but rather contains facts sufficient to support the issuance of an arrest warrant. The following statement is true to the best of my knowledge and belief.

STATUTORY AUTHORITY

- 4. Distribution or receipt of child pornography: 18 U.S.C. § 2252(a)(2) prohibits any person from knowingly receiving or distributing, or attempting or conspiring to receive or distribute, any visual depiction using any means or facility of interstate or foreign commerce, or that has been mailed or shipped or transported in or affecting interstate or foreign commerce, or which contains materials which have been mailed or so shipped or transported, by any means including by computer, or knowingly reproducing any visual depiction for distribution using any means or facility of interstate or foreign commerce, or in or affecting interstate or foreign commerce or through the mails, if the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct.
- 5. Possession of child pornography: 18 U.S.C. § 2252(a)(4)(B) prohibits any person from knowingly possessing or accessing with the intent to view, or attempting or conspiring to possess or access with the intent to view, 1 or more books, magazines, periodicals, films, video tapes, or other matter which contain any visual depiction that has been mailed, or has been shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or which was produced using materials which have been mailed or so shipped or transported, by any means including by computer, if the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct.

PROBABLE CAUSE STATEMENT

6. As will be shown below, there is probable cause to believe that **TRENT STANBERY** committed a violation of possession and distribution of Child Pornography, Title 18, United States Code, Section 2252(a)(2) and 2252(a)(4)(B) per definitions contained within Title 18 § 2252.

- 7. DEFENDANT: the defendant is **TRENT STANBERRY**, hereinafter referred to as **STANBERRY**.
- 8. On or about July 29, 2021, FBI Oklahoma City Ardmore RA received a lead from the National Center for Missing & Exploited Children (NCMEC) through the Oklahoma State Bureau of Investigation (OSBI). NCMEC is a non-profit organization that provides law enforcement, families, and the public to help find missing children, reduce child sexual exploitation and prevent child victimization. FBI Oklahoma is currently engaged in an investigation involving Child Sexual Abuse Material (CSAM). Facebook developed new technology in the fight against child exploitation and has begun to utilize photo-matching technology, artificial intelligence, and machine learning to proactively detect child nudity and previously unknown child exploitative content when it's uploaded and quickly identify the content and accounts that engage in potentially inappropriate interactions with children on Facebook and report it to NCMEC to prevent additional harm.
- 9. One individual identified during this investigation was **TRENT STANBERRY** who resided within the City of Coalgate located within the Eastern District of Oklahoma. As of March 4, 2022, **STANBERRY** relocated to Yukon, Oklahoma, located in Canadian County, which is within the Western District of Oklahoma.
- 10. On or about May 8, 2021, Facebook filed a report with the NCMEC which identified two Facebook accounts that shared six video files, two of these files depict Child Pornography as defined by Title 18, United States Code, Section 2256. Facebook identified account number 100023403161053 as belonging to **STANBERRY** and account number 511198094 as belonging to the unidentified co-conspirator ("UCC").
- 11. Facebook provided the hash values of the two files that contain suspected materials relating to Child Pornography (possession and distribution). According to Facebook, the two files

were uploaded from **STANBERRY** account UID# 100023403161053, username "trent.stanberry.906" to UCC Facebook account UID# 511198094, username "jjpaajjafaj" on or about May 7, 2021.

12. According to information obtained pursuant to a Federal Grand Jury subpoena served upon Facebook on August 17, 2021, as well as information obtained from Facebook pursuant to a search warrant executed on February 9, 2022, the Facebook account user identification number 100023403161053 was associated with the following individual:

Facebook Account Information:

- Name provided by the account holder: Trent Stanberry
- Registered Email Address: trentleestanberry@outlook.com
- User Name: trent.stanberry.906
- Date of Birth: 05/15/1991
- 13. According to Cyber Tipline Report 89968839 provided by NCMEC, on May 7, 2021, Facebook account UID# 100023403161053, associated with **STANBERRY**, utilized IP address 2600:387:1:813::5c to login to Facebook on that date and send two child pornography files to Facebook account UID# 511198094, utilized by UCC.
- 14. On August 4, 2021, FBI Child Exploitation Operations Unit "CEOU" reviewed the two videos that were provided by the NEMEC and determined that the videos contain a juvenile female engaged in various sex acts. According to CEOU, the videos appeared to be professionally produced to include background music, and the name Graham Greene appeared in the bottom left corner of the display for each video.
- 15. On or about August 19, 2021, Facebook returned a Grand Jury Subpoena for **STANBERRY** Facebook account 100023403161053. A review of Facebook subpoena information indicated that IP Address 2600:387:1:813::19 was used to login into Facebook account 100023403161053. Thus, the incident information specifically date, time, and IP address

associated with NCMEC report 89968839 is identical to the Federal Grand Jury subpoena information provided by Facebook, Inc, and associated with Facebook account 100023403161053.

- 16. On February 10, 2022, a Search warrant for Facebook account 100023403161053 "trent.stanberry.906" was obtained and executed. The following information was obtained from the examination of the Facebook return:
 - a. On 05/07/2021, and between 15:40 16:10, a conversation on Social Media Site Facebook took place between STANBERRY, Facebook account number 100023403161053 and UCC, Facebook account number 511198094. During the conversation, STANBERRY and UCC exchanged multiple videos and images that depicted various sexual acts and involved several prepubescent females.
 - b. On May 7, 2021, at 15:21 standard central time, **STANBERRY** sent a message via Facebook messenger to UCC and asked, "hey u good to receive." UCC responded "yea".
 - c. On May 7, 2021, at 15:40, **STANBERRY** sent a video that depicts sexual acts by a prepubescent female. In the video, the prepubescent female has a red towel wrapped around her body and a white towel around her head. The prepubescent female is inside a room and a bunk bed can be seen behind her. The prepubescent female takes her red towel off and begins to rub her vagina while touching and squeezing her left breast. Then she lifts her right leg and placed it on an unseen object and continue to rub her vagina. In the end, she licked her fingers and kissed the camera.
 - d. Following these photos that were sent by **STANBERRY**, UCC asked **STANBERRY** "who the small girl", **STANBERRY** replied "Beside destiny "his wife" no clue on the rest. A bit taboo. Mega downloads. I know u like petite teens." Adding, "U got more coming."
 - e. On May 7, 2021, at 15:53, **STANBERRY** sent 7 images to UCC depicting prepubescent females in various sexual acts. One of the images, "17190056484416" depicts two topless

prepubescent females engaging in a sexual act. The female on the right appears to be 11-12 years old and have what appeared to be a male semen on her lips and around her left breast. The other female appeared to be an 8-9-years-old and was licking the semen off the other prepubescent female's mouth.

- f. There were additional pictures of females in various sexual acts sent by **STANBERRY** to UCC but the age of the females was unable to be determined.
- On May 7, 2021, at 16:10, STANBERRY sent an mp4 video "4172176592861921" to UCC. The video is 2 minutes in length and depicts a prepubescent female in a wide room and completely tied up with a black rope in bondage style, her hands are tied up, and her mouth appeared to be gagged with an object to prevent her from speaking. The prepubescent female is wearing a short green dress that appears worn out or purposefully cut to see through her body. The prepubescent female lays on a gray tarpaulin sheet. A face-masked individual wearing dark clothes, high-heel female boots, and latex gloves entered the room and immediately grabs the prepubescent female by her ponytail and hands, which are still tied and sits her up. The prepubescent female sounds like she may be crying or sniffling. The face-masked individual then untied her, then retied her hands behind her back. At this point, the prepubescent female is completely naked laying on the gray sheet and her back is facing the camera. The individual spanks the prepubescent female hard, grabs her from her ponytail, and forcefully turns her around to face a black dildo that is attached to a mirror. The prepubescent female begins to suck the dildo. Shortly after that, the prepubescent female lays on the ground on her back while the face-masked individual inserts what appears to be a sex toy 'vibrato' into the prepubescent female's private part while pushing a dildo into her mouth. The video length was 2 minutes exactly.

- h. On May 7, 2021, at 15:55, UCC sent **STANBERRY** multiple videos of adults engaging in various sexual acts.
- 17. Based on the aforementioned factual information, I believe that probable cause exists for the issuance of a Criminal Complaint charging **TRENT STANBERRY** with a violation of Title 18 U.S.C. § 2252(a)(2) and 2252(a)(4)(B) the possession and distribution of child pornography
- 18. I, therefore, respectfully request that the attached warrant be issued authorizing the arrest of **TRENT STANBERRY**.

Respectfully Submitted,

Adam A. Babiker

Special Agent

Federal Bureau of Investigation